

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	NO. 21-CR-00040-RJJ
vs.)	
)	MOTION AND DECLARATION
DANIEL REYNOLD DEJAGER,)	TO PERMIT APPEARANCE VIA
<i>a/k/a Daniel Reynold, aka Daniel Miester,</i>)	ZOOM
<i>a/k/a Danichi,</i>)	
)	
Defendant.)	
)	
)	
)	

COMES NOW the defendant, by and through his attorney, Brett A. Purtzer of the Hester Law Group, Inc., P.S., and moves this Court for an order permitting counsel and the defendant to appear via Zoom for purposes of the arraignment herein.

1 THIS MOTION is based on the files and records herein and upon the
2 Declaration of Brett A. Purtzer filed in support thereof.

3 DATED this 2nd day of March, 2021.

4 HESTER LAW GROUP, INC., P.S.
5 Attorneys for Defendant

6
7 By: /s/ Brett A. Purtzer
8 BRETT A. PURTZER
9 WSB #17283
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 I, Brett A. Purtzer, hereby declare as follows:

2 That I am the attorney for Mr. Dejager and make this declaration in support of
3 his motion to permit counsel and defendant to appear for the arraignment via Zoom.

4 That on February 24, 2021, Mr. Dejager was indicted on one count of
5 Conspiracy to Operate an Unlicensed Money Transmitting Business in violation of
6 18 USC § 1960; one count of Operating an Unlicensed Money Transmitting
7 Business, in violation of 18 USC §§ 1960, 2; one count of Conspiracy to Launder
8 Money in violation of 18 USC §§ 1956, 1957; thirteen counts of Money Laundering
9 in violation of 18 USC §§ 1956, 2; and eight counts of Structuring in violation of 31
10 USC § 5313.
11

12 That Mr. Dejager's arraignment has been set for Monday, March 8, 2021 at
13 2:00 p.m. Eastern Standard Time.


14 That Mr. Dejager and counsel for Mr. Dejager both reside in the State of
15 Washington and are willing and able to participate via Zoom, if the Court so permits.
16 That counsel has explained to Mr. Dejager about the purpose of the arraignment and
17 what it entails, and Mr. Dejager is comfortable appearing by Zoom for his
18 arraignment.

19 That I have spoken with Assistant AUSA Justin Presant, and he has no
20 objection to counsel and the defendant appearing via Zoom for purposes of the
21 arraignment.
22

1 As such, the defense respectfully requests that this Court grant his motion
2 and permit counsel and defendant to appear via Zoom for the arraignment presently
3 scheduled for March 8, 2021 at 2:00 p.m. Eastern Standard Time.

4 I hereby declare under penalty of perjury under the laws of the State of
5 Washington that the foregoing is true and correct.

6 Dated this 2nd day of March, 2021 at Tacoma, Washington.

7
8 
9 _____
10 BRETT A. PURTZER
11 WSB #17283
12 Attorney for Defendant
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF SERVICE

Lee Ann Mathews, hereby certifies under penalty of perjury under the laws of the State of Washington, that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record for the plaintiff and co-defendants, if any, and hereby certify that I have mailed the document by U.S. Postal Service to Daniel Dejager, defendant.

Signed at Tacoma, Washington this 2nd day of March, 2021.

/s/ Lee Ann Mathews
LEE ANN MATHEWS